

Waukegan Harbor Citizens Advisory Group

55 Harbor Place - P.O. Box 297 Waukegan, Illinois 60079 Phone 847-244-3133 Fax 847-244-1348

Members May 19, 2008

Abbott Laboratories Akzo Nobel Alliance of the Great Lakes **Bombardier Recreational Products Carol Dorge, Attorney** City of North Chicago City of Waukegan **College of Lake County** Commonwealth Edison **EJ & E Railway Great Lakes Sport Fishing Council** Illinois Audubon Society **Integrated Lakes Management Johns Manville LaFarge Corporation Lake County Chamber of Commerce Lake County Department of Planning Lake County Health Department** Larsen Marine, Inc. LFR Levine • Fricke **Liberty Prairie Conservancy Midwest Generation National Gypsum North Shore Gas North Shore Sanitary District Salmon Unlimited** Sierra Club, Illinois Chapter **Tanner Environmental Company** Waukegan Charter Boat Association **Waukegan Downtown Association** Waukegan Lakefront Development Corp. Waukegan Park District Waukegan Port District Waukegan Yacht Club **Concerned Citizens**

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Kevin Adler
U.S. Environmental Protection Agency – Region 5
77 W. Jackson Blvd.
Chicago, Illinois 60604

Subject: Waukegan Harbor Superfund Cleanup Alternatives-Unit 1

Dear Mr. Adler:

We recognize that the cleanup of Waukegan Harbor is now in the Superfund program.

Most members of the Waukegan Harbor Citizen's Advisory Group support the full cleanup of the federal harbor in Waukegan as presented to the Great Lakes National Program Office under the Legacy Act a year ago. Removal of the contaminants of record, thus rendering the whole area safe for any future use of the Federal Harbor gives the greatest and most varied use to ALL current and potential users safely. This is a federal area and should be cleaned for the use of all citizens, flora, fauna and biota. It should not be a limited cleanup targeted for the use of a selected few users groups.

The general public would like to see a fully cleaned harbor AND have both Government Pier and the Federal Harbor remain in public ownership. They do not want the harbor ownership transferred to the City of Waukegan for its limited range of use. Most residents cannot understand the narrow view taken by the City of Waukegan leadership last summer in rejecting the Legacy Act clean up opportunity by trying to privatize the harbor and restricting its future use.

This is a deep water port servicing highly viable industries, educational ships, large recreational ships and more importantly is the only harbor of refuge for all ships between Chicago and Milwaukee. It is far more expedient to come into a safe harbor in time of distress, rather than have an avoidable breakup and/or spill resulting in heavy cleanup expenses that would have to be incurred by federal and state governmental units.

In a time of rapidly rising costs and heavy burdens on our highways, this is the time to keep infrastructure commodity costs down by using bulk cargo via our well utilized port. Local and regional referendums for schools, parks, libraries, roads etc. will be greatly affected if the cement and gypsum have to come from much further distances via truck or rail.

If the contaminants of record are capped in place, we will/might never be able to easily clean the harbor should a spill of any kind later occur as it would likely have to disturb the cap, which would then have to be replaced yet again. The long term maintenance of a cap has to be weighed against a one time full cleanup.

The Lake County Board of Commissioners voted unanimously in the fall of 2006 to support a full clean up of the harbor to meet both economic and environmental goals with post clean up monitoring to verify results. This harbor

supports a large community of subsistence fishermen from a variety of different ethnic communities. Our short term actions need to responsibly meet the long term needs of the region. Capping is a quick fix that leaves a long term legacy of containments within the lakebed of the Lake Michigan shoreline.

The Waukegan Harbor Citizens' Advisory Group pledges to work with the USEPA to raise the necessary local funding (10% of the project cost) to meet a full navigational and environmental harbor cleanup under the Superfund program.

Thank you for your agency's untiring efforts in the remediation the Waukegan Harbor Area of Concern.

Waukegan Harbor Citizens' Advisory Group

Jean B. Schreiber – "Susie" Chair

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